

For Six Month Period Ending June 4, 1991
(Insert date)

Name of Registrant
ARNOLD & PORTER

Registration No.
1750

Business Address of Registrant
**1200 New Hampshire, N.W.
Washington, D.C. 20036**

I—REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: **N/A**

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

During this six-month reporting period, the Registrant opened branch offices in Los Angeles, California and Tokyo, Japan; the addresses for those offices are as follows:

**Wells Fargo Center
South Tower, 44th Floor
355 South Grand Avenue
Los Angeles, CA 90071**

**Kioicho D Building 2F
3-28, Kioicho
Chiyoda-ku
Tokyo 102, Japan**

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name

Position

See Attachment 3A

Date Connection
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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See Attachment 4A

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☒ No ☐

If yes, identify each such person and describe his services.

See Attachment 5A

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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See Attachment 6A

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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See Attachment 7A

II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name of foreign principal

Date of Termination

See Attachment 8A

-
9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

Name and address of foreign principal

Date acquired

See Attachment 9A

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10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

See Attachment 10A

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment 11A

¹ The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment 12A

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

N/A

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment 14A

Total

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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N/A

³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(c).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment 15A

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
N/A				

(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒*

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
*/ See Attachment 15C			

*/ See Attachment 15C

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Canadian Meat Council

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

N/A

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

- ☒ Other (specify) **Background papers; comments filed with USTR; summary of reasons for denying NPPC request for extraordinary challenge under Canada-U.S. F.T.A.**

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

- ☒ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda:

- ☒ English ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☒ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

- Exhibit A⁶ Yes ☒ No ☐
Exhibit B⁷ Yes ☒ No ☐

If no, please attach the required exhibit. N/A

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represent during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

N/A

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

N/A

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

William D. Rogers

Washington, D.C.

Subscribed and sworn to before me at _____

this 30th day of July, 1991

Jean A. Jantz
(Signature of notary or other officer) Jean A. Jantz
My commission expired: 9-30-91

¹The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes xx or No _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Wm D Rogers
Signature

July 30, 1991
Date

William D. Rogers
Please type or print name of signatory on the line above

Partner
Title

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CRIMINAL DIVISION
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

Attachment 3A

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name</u>	<u>Position</u>	<u>Date Connection Ended</u>
Thomas Seawell	Partner	December 31, 1990
Ronald Stern	Partner	December 31, 1990
Robert S. Thorpe	Partner	February 22, 1991
Myron P. Curzan	Partner	April 30, 1991

* * *

In addition, George E. Covucci, James A. Dobkin, Richard L. Hubbard, Steven P. Lockman, G. Philip Nowak, and K. Peter Schmidt, who have previously filed Short Form Registration Statements, are not rendering services to any of the Registrant's foreign principals. These short form registrations are hereby terminated.

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

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CRIMINAL DIVISION

Attachment 4A

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

[see attached next page]

<u>Name</u>	<u>Residence Address</u>	<u>Citizenship</u>	<u>Position</u>	<u>Date Assumed</u>
Philip H. Curtis	411 West End Ave. #11D New York, NY 10024	USA	Partner	02/01/91
David P. Gersch	2410 20th Street, N.W. Washington, DC 20009	USA	Partner	01/01/91
Neil M. Goodman	2455 Tunlaw Road, N.W. Washington, DC 20007	USA	Partner	01/01/91
Matthew T. Heartney	1885 Michael Lane Pacific Palisades, CA 90272	USA	Partner	02/01/91
Bruce R. Kelly	674 Silvermine Road New Canaan, CT 06840	USA	Partner	02/01/91
Arthur N. Levine	8933 Cherbourg Drive Potomac, MD 20854	USA	Partner	04/29/91
Mark R. Merley	5326 Allandale Road Bethesda, MD 20816	USA	Partner	01/01/91
Robert S. Mintz	6115 Wilmett Road Bethesda, MD 20817	USA	Partner	01/01/91
David Neslin	720 South Jackson Street Denver, Colorado 80210	USA	Partner	01/01/91
Fern P. O'Brian	4120 Nelly Custis Dr. North Arlington, Virginia 22207	USA	Partner	01/01/91
L. Stevenson Parker	518 Club Road Tracy's Landing, MD 20779	USA	Partner	01/01/91
Otis P. Pearsall	157 Willow Street Brooklyn, NY 11201	USA	Partner	02/01/91
Ronald C. Redcay	1525 Milan Avenue South Pasadena, CA 91030	USA	Partner	02/01/91
Michael T. Shor	2024 Lanier Drive Silver Spring, MD 20910	USA	Partner	01/01/91
Michael Stosser	1505 R Street, N.W. Washington, DC 20009	USA	Partner	01/01/91

Attachment 5A

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?

☒ Yes

☐ No

If yes, identify each such person and describe his services.

The following persons listed in Item 4, who are partners in the Registrant, have rendered services directly in furtherance of the interests of one or more of the Registrant's foreign principals:

Neil M. Goodman
Robert S. Mintz
Michael T. Shor
Michael Stosser

* * *

In addition, the following persons, who became partners in the Registrant during earlier reporting periods, began to render services to one or more of the Registrant's foreign principals during this period:

Mark H. Boscoe
Steven G. Tepper
Victoria Schonfeld

Attachment 6A

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name</u>	<u>Position or Connection</u>	<u>Date Terminated</u>
Neil Belson	Associate	May 3, 1991
Evan Bloom	Associate	April 10, 1991
Michael Faber	Associate	April 12, 1991
Laurence Freedman	Associate	March 15, 1991
Lauren Gilbert	Associate	February 1, 1991

* * *

In addition, the following employees, who have previously filed Short Form Registration Statements, are not rendering services to any of the Registrant's foreign principals, and their Short Form Registration Statements are hereby terminated:

Susan Arnold
James L. Beller, Jr.
James D. Butler
Dorene L. Cadoff
Michael Caglioti
Margaret A. Campell
Margaret L. Jacobs
George W. Kaufman
Cheryl A. Kettler
Hollie M. Nielsen
Gary P. Poon

Attachment 7A

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Jonathan Ratner	34 West 85th Street New York, New York 10024	Associate	01/22/91

* * *

In addition, the following persons, hired previously, began to render services to one or more of the Registrant's foreign principals during this period:

<u>Name</u>	<u>Residence Address</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Richard Baltz	5621 Kemp Lane Burke, VA 22015	Associate	01/08/90
Dorene Cadoff	1643 Barton Street South Arlington, Virginia 22204	Associate	09/26/88
Paolo Carozza	5135 Sherier Place N.W. Washington, D.C. 20016	Associate	07/16/90
Scott Dahl	6810 Montivideo Square Ct. Falls Church, VA 22043	Associate	03/27/89
Christina Downey	200 East 89th Street New York, New York 10128	Associate	10/15/90

<u>Name</u>	<u>Residence Address</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Steven R. Englund	1600 South Eads Street Arlington, Virginia 22202	Associate	11/05/90
Mary Grace Fleeman	3 Scottview Court Potomac, MD 20854	Associate	08/19/85
Sonia Fois	332 E Street, N.E. Washington, D.C. 20003	Associate	05/27/86
Kathleen Kelly	6616 Hillandale Road Chevy Chase, MD 20815	Associate	09/26/88
Jerome Levinson	8303 Woodhaven Blvd. Bethesda, MD 20817	Of Counsel	07/16/90
Elizabeth Loeb	1832 Calvert Street, N.W. Washington, D.C. 20009	Associate	01/16/90
James Losey	4407 Gladwyne Drive Bethesda, Maryland 20814	Associate	09/10/90
Hollie Nielsen	526 Fourth Street, S.E. Washington, D.C. 20003	Associate	09/14/87
Anthony O'Brien	7503A Weatherworn Way Columbia, MD 21046	Associate	08/29/88
Michael Oshima	56 Joralemon Street Brooklyn, New York 11201	Associate	11/26/90
Samuel A. Thumma	1714 N. Wakefield Street Arlington, Virginia 22207	Associate	10/01/90
Asim Varma	1545 18th Street, N.W. Washington, D.C. 20036	Associate	10/31/88
Kent Yalowitz	330 East 33rd Street New York, NY 10016	Associate	11/28/89

Attachment 8A

8. Has your connection with any foreign principal ended during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name of Foreign Principal</u>	<u>Date of Termination</u>
Airbus Industrie	May 1991 ^{*/}
Government of the Republic of Panama	May 1991
Goverment of Aruba	January 1991

* * *

^{*/} After this date, representation of this foreign principal is limited to activities exempt from registration under Section 3 of the Act.

Attachment 9A

9. Have you acquired any new foreign principal during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

Name and Address of Foreign Principal

Date Acquired

Asociacion de Productores de Salmon
y Trucha de Chile (A.G.)
Av. B. O'Higgins 949
Ofc. 811
Casilla 453
Central de Casillas
Santiago, Chile

March 1991^{1/}

Canadian Meat Council
5233 Dundas Street
Islington, Ontario M9B 1A6
Canada

November 1984^{2/}

Thomson-CSF
Cedex 67
92045 Paris
La Defense, France

September 1990^{3/}

^{1/} Prior to May 1991, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act.

^{2/} Prior to March 1991, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act.

^{3/} Prior to March 1991, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act.

Attachment 10A

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the 6 month reporting period.

Asociacion Venezolana
de Productores de Cementos
Asociacion Colombiana de Exportadores
de Flores (Asocolflores)
Banco Central do Brasil
British American Arts Association (U.K.) Ltd.
Government of Brazil
Government of Canada
Government of Chile
International Commodities Clearing House, Ltd.
Joint Exchanges Committee
Komatsu Ltd.
Profilo Holding A.S.
Republic of Venezuela
State of Israel
Suramerica de Aleaciones Laminadas, C.A. (Sural)
The International Petroleum Exchange of London
Limited
The London Commodity Exchange (1986) Limited
(known also as The London Futures and
Options Exchange and the London Fox)
The London International Financial
Futures Exchange Ltd.

Attachment 11A

11. During this 6-month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9 and 10 of this statement?

☒ Yes

☐ No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Airbus Industrie

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning international trade in civil aircraft and manufacture and sale of civil aircraft.

***Asociacion de Productores
de Salmon y Trucha de Chile (A.G.)***

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies in connection with trade matters affecting Chilean exports of fresh salmon to the United States. See also response to question 12.

Asociacion Venezolana de Productores de Cementos

The Registrant rendered advice to and represented the foreign principal in connection with possible antidumping and countervailing duty cases against imports of cement from Venezuela and in connection with proceedings in such cases filed on May 21, 1991. The Registrant gathered information and had contacts with individuals involved in the cement trade and non-federal government officials that did not constitute political activity. See also response to question 12.

Asocolflores

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, policies, and proposed legislation concerning international trade, customs classification, the Andean Trade Preferences Act, and other matters of interest to the foreign principal. The Registrant also represented the foreign principal in antidumping and countervailing duty proceedings concerning imports of flowers from Colombia. See also response to question 12.

Banco Central do Brasil/Government of Brazil

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning export controls and international trade, international banking, taxation, and securities. The Registrant represented the foreign principal with respect to the restructuring of Brazilian external commercial bank debt. The Registrant also rendered advice and provided services concerning the possible privatization of certain Brazilian state enterprises.

British American Arts Association (U.K.) Ltd.

No activity.

Canadian Meat Council

The Registrant provided advice and representation with respect to bi-national panels and extraordinary challenge proceedings in connection with International Trade Commission and Department of Commerce decisions in the countervailing duty proceedings on imports of fresh, chilled, and frozen pork from Canada. See also response to question 12.

Government of Aruba

No activity.

Government of Canada

The Registrant rendered advice to the foreign principal on GATT issues and on U.S. laws, regulations, and policies relating thereto. The Registrant also rendered advice to the foreign principal on U.S. trade and tax laws, regulations, and policies.

Government of Chile

The Registrant rendered advice to the foreign principal on possible claims against the United States government as a result of the 1989 U.S. embargo of Chilean grapes and filed a claim on the foreign principal's behalf under the Federal Tort Claims Act. See also response to question 12.

Government of the Republic of Panama

The Registrant represented the foreign principal in litigation against Bank of Boston, International.

Komatsu Ltd.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies of interest to them in the conduct of their businesses, including tax and customs issues. The Registrant also advised and represented the foreign principal in connection with the participation of subsidiaries of the foreign principal in two U.S. joint ventures, Cybermation Cutting Systems, Inc. and Komatsu Dresser Company, and represented the foreign principal in connection with a Federal Maritime Commission proceeding.

Profilo Holding A.S.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, policies, and proposed legislation, that could affect or relate to activities of the foreign principal and U.S. - Turkey relations.

Republic of Venezuela

The Registrant assisted the foreign principal in connection with the negotiation, drafting, preparation, and implementation of the 1990 Republic of Venezuela Financing Plan, and related bond instruments, and in connection with the negotiation of loans from the Export-Import Bank of Japan. The Registrant provided advice to the foreign principal on proposed gold swap transactions between the Central Bank of Venezuela and a U.S. commercial bank; on trade matters, including the Uruguay Round of GATT negotiations and an Enterprise for the Americas Initiative Framework Agreement; on a Section 19 proceeding before the Federal Maritime Commission; and on general litigation issues in connection with pending and possible litigation in which the foreign principal was or may become involved in the United States. In addition, the Registrant prepared, on behalf of the foreign principal, a submission to a GATT panel in connection with a U.S. - Mexican tuna/dolphin dispute, and provided advice on U.S. laws, regulations, and policies concerning that dispute. In connection with some of the foregoing activities, the Registrant had contacts with U.S. government officials that did not constitute political activity. See also response to question 12.

State of Israel

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning U.S. appropriations to Israel in connection with Operation Desert Storm. The Registrant advised and represented the foreign principal in connection with the public offering of the foreign principal's debt securities for housing loans, guaranteed by the Agency for International Development. In connection with the foregoing and otherwise, the Registrant rendered advice to the foreign principal on U.S. banking, tax, and securities laws, regulations, policies, and proposed legislation, concerning loan programs of the foreign principal, including possible Export-Import Bank financing for such loans.

Suramerica de Aleaciones Laminadas, C.A.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning international trade, customs, and finance issues, and on the GATT panel decisions possibly affecting the foreign principal. The Registrant also advised and represented the foreign principal in connection with potential commercial transactions. The Registrant also advised and represented the foreign principal on U.S. customs matters relating to the classification of aluminum stranded conductors, including a meeting with U.S. Customs officials which did not constitute political activity. In addition, the Registrant represented the foreign principal in antidumping and countervailing duty proceedings with respect to electrical conductor aluminum redraw rod before the U.S. Department of Commerce and the U.S. Court of International Trade, and the U.S. Court of Appeals for the Federal Circuit. See also response to question 12.

***The London Commodity Exchange (1986) Limited
(known also as The London Futures and
Options Exchange and the London Fox)***

The Registrant rendered advice to The London Futures and Options Exchange concerning proposed U.S. legislation that would restrict trade in Cuban commodities and on the possible establishment of a U.S. subsidiary.

***The International Commodities Clearing House, Ltd.
The International Petroleum Exchange of London Limited
Joint Exchanges Committee
The London International Financial Futures Exchange Ltd.***

No activity.

Thomson-CSF

The Registrant provided advice and representation to the foreign principal in connection with reprogramming and financing proposals pending before the United States Congress concerning the Department of the Army's reprogramming request for the multiple launch rocket system terminal guidance warhead, a joint program involving U.S., French, German, and British companies. In connection with the foregoing activities, the Registrant had contacts with U.S. government officials that did not constitute political activity. See also response to question 12.

Attachment 12A

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

☒ Yes

☐ No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

**Asociacion de Productores
de Salmon y Trucha de Chile (A.G.)**

On behalf of the foreign principal, the Registrant had telephone conversations with Kathryn L. Stevens, Desk Officer, State Department, and with Joshua Bolten, General Counsel, Office of the U.S. Trade Representative, on May 21, 1991 (in separate telephone calls) and with Jon E. Huenemann, Deputy Assistant U.S. Trade Representative on May 22, 1991; and met with Ms. Stevens on May 23, 1991. All contacts were in connection with matters affecting Chilean exports of fresh salmon to the United States.

**Asociacion Venezolana
de Productores de Cementos**

On behalf of the foreign principal, the Registrant had meetings with: James Mack, Director, Office of Andean Affairs, Department of State, and Collum McKay, Venezuelan Desk, Department of State, on December 5, 1990; William DesRoches, Director, Andean Division, Department of Commerce, on December 5, 1990; Al Cumming, Legislative Assistant to Senator Bob Graham, on December 7, 1990; Elizabeth Mehl, Legislative Director, Office of Congressman Ireland, on December 7, 1990; Charles Ries, Deputy Assistant U.S. Trade Representative, on December 7, 1990; and Marjorie Chorlins, Deputy Assistant Secretary in Charge of Administration, Charles Ford, Office of South America, and Jean Kemp, Special Advisor to Eric Garfinckel, the Assistant Secretary for Import Administration, all of the Department of Commerce, on December 10, 1990. All contacts were in connection with opposition to possible antidumping and countervailing duty proceedings against cement from Venezuela.

Asocolflores

On behalf of the foreign principal, the Registrant had a telephone conversation with Bruce L. Gardner, Assistant Secretary for Economics, Department of Agriculture, on January 4, 1991, in connection with opposition to the conduct of a flower consignment study.

Canadian Meat Council

On behalf of the foreign principal, the Registrant had meetings with Brad Figel, staff member of the Senate Finance Committee, on March 19, 1991; with Meredith Broadbent, staff member of the House Ways and Means Committee, on March 19, 1991; and with Janet Nuzum, staff member of the Trade Subcommittee of the House Ways and Means Committee, on March 27, 1991. These contacts were in connection with opposition to a request for the establishment of an extraordinary challenge committee concerning International Trade Commission and Department of Commerce decisions in the countervailing duty case on imports of fresh, chilled, and frozen pork from Canada. In addition, the Registrant disseminated political propaganda with respect to which Dissemination Reports were filed.

Government of Chile

On behalf of the foreign principal, the Registrant had meetings with Lawrence S. Eagleburger, Deputy Secretary of State, on January 9 and February 26, 1991, concerning the U.S. position on the embargo of Chilean grapes.

Republic of Venezuela

On behalf of the foreign principal, the Registrant had telephone conversations with Edwin Yeo, Counsellor to the President, Federal Reserve Bank of New York, on December 13 and December 18, 1990, and on February 20, 1991, and met with Mr. Yeo on December 14, 1990, and January 1 and 16, 1991. These contacts dealt with external debt of the foreign principal.

Suramerica de Aleaciones Laminadas, C.A. (Sural)

On behalf of the foreign principal, the Registrant had a telephone conversation with Dan Stein, Regional Director, U.S. Trade and Development Program, Agency for International Development, on December 5, 1990, about the procedure for the foreign principal's grant requests.

Thomson-CSF

On behalf of the foreign principal, the Registrant had telephone conversations with John Hamre, staff member of the Senate Armed Services Committee, on March 27, May 1, and May 9, 1991; with Bruce MacDonald in Senator Bumpers' office on April 30 and May 1, 1991; with Peter Lennon, staff member of the Senate Armed Services Committee, on May 9, 10, and 13, 1991; with Eric Newsom in Senator Leahy's office, Mike Walker in Senator Sasser's office, Al Cumming in Senator Graham's office, and S. Waxman in Senator Lautenberg's office on April 30, 1991 (all in separate telephone calls); with Les Brownlee, staff member of the Senate Armed Services Committee, on May 10, 1991; and with Arnold Punaro, Staff Director, Senate Armed Services Committee, on May 20, 1991. The Registrant also had meetings with Mr. Hamre on April 5 and 11, 1991; with Mr. Lennon on April 15, 1991; with William Hoehn, staff member of the Senate Armed Services Committee, on April 15, 1991; and with Tom Young and Terry Lynch in Senator Shelby's office on April 30, 1991. These contacts were in support of the Department of the Army's reprogramming request for the multiple Launch Rocket System Terminal Guidance Warhead and the Administration's budget request for the program.

Attachment 14A

14.(a) Receipts -- Monies

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

 X Yes

 No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
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The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

Venezuela, Gov't of

12/31/90	Venezuela, Gov't of	Fees	\$ 1,245,730.87
12/31/90	Venezuela, Gov't of	Disbursements	413,975.53
02/15/91	Venezuela, Gov't of	Fees	449,316.25
02/15/91	Venezuela, Gov't of	Disbursements	232,807.42
05/28/91	Venezuela, Gov't of	Fees	587,971.30
05/28/91	Venezuela, Gov't of	Disbursements	115,014.56
		Total Fees	2,283,018.42
		Total Disbs.	761,797.51

Government of Canada

01/16/91	Government of Canada	Fees	\$ 5,332.50
01/16/91	Government of Canada	Disbursements	205.33
01/22/91	Government of Canada	Fees	828.75
01/22/91	Government of Canada	Disbursements	105.20
02/25/91	Government of Canada	Fees	4,132.50
02/25/91	Government of Canada	Disbursements	1,135.99
04/22/91	Government of Canada	Fees	16,242.50
04/22/91	Government of Canada	Disbursements	538.75
		Total Fees	26,536.25
		Total Disbs.	1,985.27

Banco Central Do Brasil and
Government of Brazil

02/11/91	Banco Central Do Brasil	Fees	\$ 275,047.59
02/11/91	Banco Central Do Brasil	Disbursements	7,851.16
02/25/91	Banco Central Do Brasil	Disbursements	14,390.62
04/26/91	Banco Central Do Brasil	Fees	79,699.25
04/26/91	Banco Central Do Brasil	Disbursements	3,347.00
04/30/91	Banco Central Do Brasil	Fees	66,377.99
04/30/91	Banco Central Do Brasil	Disbursements	1,183.26
05/07/91	Banco Central Do Brasil	Fees	96,377.75
05/07/91	Banco Central Do Brasil	Disbursements	4,702.01
		Total Fees	517,502.58
		Total Disbs.	31,474.05

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Profilo Holding, A.S.</u>			
<u>Enka Holding Yatirim, A.S.</u>			
<u>Halk Sigorta T.A.S.</u>			
<u>Sezai Turkes-Feyzi Akkaya Construction Co.</u>			
<u>Tansit Sanayi</u>			
<u>Iktisat Bankasi</u>			
<u>Ak-Pa Tekstil Ihracat Pazarlama, A.S.</u>			
<u>Fentex International Corp.</u>			
12/17/90	Enka Holding	Fees	\$ 2,501.65
12/17/90	Enka Holding	Disbursements	1,098.35
01/24/91	Ak-Pa Tekstil Ihracat Pazarlama	Fees	3,600.00
01/25/91	Profilo Holding, A.S.	Fees	3,600.00
02/28/91	Fentex International Corp.	Fees	3,600.00
04/11/91	Ak-Pa Tekstil Ihracat Pazarlama	Fees	3,600.00
04/12/91	Iktisat Bankasi Turkes	Fees	3,600.00
04/18/91	Sezai Turkes Feyzi Akkaya	Fees	3,600.00
05/03/91	Profilo Holding, A.S.	Fees	3,600.00
05/10/91	Enka Holding	Fees	3,600.00
05/21/91	Fentex International	Fees	3,600.00
		Total Fees	\$ 34,901.65
		Total Disbs.	1,098.35
<u>State of Israel</u>			
02/11/91	State of Israel	Fees	\$ 986.63
02/11/91	State of Israel	Disbursements	307.96
02/25/91	State of Israel	Fees	13,240.00
02/25/91	State of Israel	Disbursements	744.96
03/08/91	State of Israel	Fees	1,112.62
03/08/91	State of Israel	Disbursements	198.34
04/29/91	State of Israel	Fees	549,691.20
04/29/91	State of Israel	Disbursements	29,177.06
05/21/91	State of Israel	Fees	9,410.62
05/21/91	State of Israel	Disbursements	460.00
		Total Fees	\$ 574,441.07
		Total Disbs.	30,888.32
<u>Israel Military Industries</u>			
12/12/90	Israel Military Industries	Fees	\$ 24.37
12/12/90	Israel Military Industries	Disbursements	11.36
05/31/91	Israel Military Industries	Fees	111.55
05/31/91	Israel Military Industries	Disbursements	119.80
		Total Fees	\$ 135.92
		Total Disbs.	131.16
<u>Asocolflores</u>			
01/29/91	Asocolflores	Fees	\$ 181,340.00
01/29/91	Asocolflores	Disbursements	195,382.05
03/18/91	Asocolflores	Fees	963.75
04/11/91	Asocolflores	Fees	61,516.19
04/11/91	Asocolflores	Disbursements	39,846.80
		Total Fees	\$ 243,819.94
		Total Disbs.	235,228.85

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>London Fox</u>			
04/12/91	London Fox	Fees	\$ 8,388.00
04/12/91	London Fox	Disbursements	4,407.45
<u>Sural Ca.</u>			
12/31/90	Sural Ca	Fees	\$ 157,541.65
12/31/90	Sural Ca	Disbursements	12,117.33
03/25/91	Sural Ca	Fees	121,989.60
03/25/91	Sural Ca	Disbursements	8,792.77
05/29/91	Sural Ca	Fees	108,321.25
05/29/91	Sural Ca	Disbursements	12,738.07
		Total Fees	\$ 387,852.50
		Total Disb.	33,648.17
<u>Int'l Comm. Clearing House, Ltd.</u>			
02/04/91	Int'l Comm. Clearing House, Ltd.	Fees	35.00
02/04/91	Int'l Comm. Clearing House, Ltd.	Disbursements	358.80
<u>Asociacion de Productores de Salmon y. Trucha de Chile (A.G.)</u>			
4/18/91	Asociacion de Productores de	Fees	24,361.44
04/18/91	Asociacion de Productores de	Disbursements	635.89
<u>Government of Chile</u>			
01/02/91	Government of Chile	Fees	50,000.00
04/12/91	Government of Chile	Fees	246,275.06
04/12/91	Government of Chile	Disbursements	43,704.94
		Total Fees	\$ 296,275.06
		Total Disb.	43,704.94
<u>Canadian Meat Council</u>			
01/29/91	Canadian Meat Council	Fees	61,305.00
01/29/91	Canadian Meat Council	Disbursements	6,419.35
03/14/91	Canadian Meat Council	Fees	37,755.00
03/14/91	Canadian Meat Council	Disbursements	2,630.99
05/13/91	Canadian Meat Council	Fees	44,760.00
05/13/91	Canadian Meat Council	Disbursements	6,480.35
		Total Fees	\$ 143,820.00
		Total Disb.	15,530.69
<u>Asociacion Venezolana de Productores de Cementos</u>			
12/05/90	Asociacion Venezolana de	Fees	15,000.00
01/25/91	Asociacion Venezolana de	Fees	17,911.20
01/25/91	Asociacion Venezolana de	Disbursements	8,585.80
03/06/91	Asociacion Venezolana de	Fees	38,622.50
03/06/91	Asociacion Venezolana de	Disbursements	38,689.77
05/10/91	Asociacion Venezolana de	Fees	24,193.75
05/10/91	Asociacion Venezolana de	Disbursements	40,595.87
		Total Fees	\$ 95,727.45
		Total Disb.	87,871.44

Receipts (cont.)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Komatsu Ltd.</u>			
12/27/90	Komatsu Ltd.	Fees	\$ 116,132.50
12/27/90	Komatsu Ltd.	Disbursements	6,605.96
12/31/90	Komatsu Ltd.	Disbursements	1,675.49
01/07/91	Komatsu Ltd.	Fees	206,194.49
01/07/91	Komatsu Ltd.	Disbursements	41,093.85
02/25/91	Komatsu Ltd.	Fees	131,665.00
02/25/91	Komatsu Ltd.	Disbursements	11,640.29
03/19/91	Komatsu Ltd.	Fees	7,395.00
03/19/91	Komatsu Ltd.	Disbursements	5,104.32
04/18/91	Komatsu Ltd.	Fees	16,435.00
04/18/91	Komatsu Ltd.	Disbursements	4,170.88
04/25/91	Komatsu Ltd.	Fees	815.00
04/25/91	Komatsu Ltd.	Disbursements	107.07
04/30/91	Komatsu Ltd.	Fees	10,445.00
04/30/91	Komatsu Ltd.	Disbursements	525.24
		Total Fees	\$ 489,081.99
		Total Disb.	70,923.10

Attachment 15A

15.(a) Disbursements -- Monies

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 or 10 of this statement?

 X Yes No

- (2) transmitted monies to any such foreign principal?

 Yes X No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
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The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

London International Financial Futures Exchange Ltd.

01/10/91	Xerox Corporation	Duplicating	\$.25
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The London Futures and Options Exchange

Various	Xerox Corporation	Duplicating	\$ 87.00
Various	C&P Telephone Company	Telephone	57.32
Various	A&P Employees	Local Transportation	4.00
Various	A&P Employees	Cash Expense	5.00
Various	Lexis	Computer Research	236.44
Various	APCO Associates		
	Three Lafayette Centre		
	1155 21st Street, N.W. Suite 1000	Professional Service	
	Washington, D.C. 20036	Fees	<u>3,328.70</u>
		TOTAL	\$ 3,718.46

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Airbus Industrie</u>			
Various	Xerox Corporation	Duplicating	\$ 69.50
05/13/91	Airbus Industrie	Refund of Duplicate payment	<u>1,521.46</u>
		TOTAL	\$ 1,590.96
<u>The State of Israel</u>			
Various	Xerox Corporation	Duplicating	\$ 13,503.50
Various	Disclosure, Inc.	Duplicating	87.78
Various	U.S. Postal Service	Postage	21.42
Various	A&P Employees	Local Transportation	4,578.72
Various	C&P Telephone	Telephone	911.05
Various	New York Telephone	Telephone	1,401.41
Various	A&P Employees	Cash Expenses	4,640.69
Various	Lexis	Computer Research	10,380.94
Various	Apple Courier Incorporated	Courier	19.75
Various	Falcon Express	Courier	351.15
Various	Grace Courier	Courier	638.45
Various	Deluxe Delivery Systems	Courier	386.50
Various	Federal Express	Courier	997.75
Various	A&P Attorneys	Travel Expenses	4,061.38*
03/12/91	Securities & Exchange Commission	Filing Fees	<u>500.00</u>
		TOTAL	\$ 42,480.49
<u>Thomson-CSF</u>			
Various	Xerox Corporation	Duplicating	\$ 506.50
04/10/91	Minuteman Press	Duplicating	33.97
Various	C&P Telephone Company	Telephone	25.14
Various	U.S. Postal Service	Postage	3.87
Various	A&P Employees	Local Transportation	37.50
Various	A&P Employees	Cash Expense	45.60
03/30/91	Federal Express	Courier	9.50
05/15/91	Falcon Express	Courier	<u>14.35</u>
		TOTAL	\$ 676.43

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Israel Military Industries</u>			
Various	Xerox Corporation	Duplicating	\$ 61.25
Various	C&P Telephone	Telephone	4.43
Various	Lexis	Computer Research	304.85
Various	A&P Employees	Cash Expenses	6.00
01/28/91	IMI Services USA, Inc.	Refund of overpayment	<u>487.50</u>
		TOTAL	\$ 864.03

British American Arts Association (U.K.) Ltd.

Various	Xerox Corporation	Duplicating	\$ 31.90
Various	C&P Telephone	Telephone	81.95
Various	A&P Employees	Local Transportation	52.28
12/31/90	Federal Express	Courier	14.50
03/15/91	Falcon Express	Courier	9.75
04/08/91	D.C. Treasurer	Filing Fees	<u>25.00</u>
		TOTAL	\$ 215.38

Government of Canada

Various	Xerox Corporation	Duplicating	\$ 730.25
Various	C&P Telephone	Telephone	240.07
Various	U.S. Postal Service	Postage	1.51
Various	A&P Employees	Local Transportation	69.75
Various	A&P Employees	Cash Expenses	155.64
Various	Lexis	Computer Research	265.78
05/01/91	Westlaw	Computer Research	1,099.80
Various	Falcon Express	Courier	49.25
Various	Federal Express	Courier	51.40
Various	Apple Courier	Courier	31.00
Various	National News Agency	Publication	54.38
Various	APCO Associates		
	Three Lafayette Centre		
	1155 21st Street, N.W. Suite 1000	Professional Service	
	Washington, D.C. 20036	Fees	<u>385.00</u>
		TOTAL	\$ 3,133.83

Disbursements (Cont.)

Profilo Holding A.S.

Various	Xerox Corporation	Duplicating	\$	1,153.00
Various	C&P Telephone	Telephone		374.09
Various	U.S. Postal Service	Postage		6.55
Various	A&P Employees	Local Transportation		950.63
Various	A&P Employees	Cash Expenses		484.53
Various	A&P Attorneys	Travel Expense		2,776.76*
01/25/91	DHL Airways, Inc.	Courier		70.08
02/27/91	Falcon Express	Courier		18.80
Various	APCO Associates Three Lafayette Centre 1155 21st Street, N.W., Suite 1000 Washington, D.C. 20036	Professional Service Fees		928.25
12/05/90	Turkish-U.S. Business Council	Meeting		100.00
02/08/91	American Friends of Turkey	Meeting		70.00
		TOTAL	\$	6,932.69**

Canadian Meat Council

Various	Xerox Corporation	Duplicating	\$	5,410.25
Various	C&P Telephone Company	Telephone		326.82
Various	U.S. Postal Service	Postage		16.50
Various	A&P Employees	Local Transportation		465.32
Various	A&P Employees	Cash Expense		207.92
Various	Lexis	Computer Research		362.10
Various	Federal Express	Courier		424.90
Various	Falcon Express	Courier		1,436.10
Various	News Agency	Publications		54.38
03/21/91	Cameron & Hornbostel	Deposition Transcript		127.56
Various	APCO Associates Three Lafayette Centre 1155 21st Street, N.W. Suite 1000 Washington, D.C. 20036	Professional Service Fees		4,147.85
		TOTAL	\$	12,979.70

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

** In addition, during this six-month period, Registrant credited the foreign principal's account for disbursements aggregating \$15,400.75 that had previously been mistakenly charged to the account (and previously reported as disbursements on behalf of this foreign principal in prior Supplemental Statements of the Registrant).

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Banco Central do Brasil and Government of Brazil</u>			
Various	Xerox Corporation	Duplicating	\$ 11,724.20
Various	U.S. Postal Service	Postage	4.70
Various	C&P Telephone	Telephone	1,172.27
Various	New York Telephone	Telephone	1,796.58
Various	A&P Employees	Local Transportation	3,834.81
Various	A&P Employees	Cash Expenses	1,330.23
Various	Falcon Express	Courier	277.00
Various	DHL Airways	Courier	807.67
05/29/91	World Courier	Courier	260.00
03/22/91	Federal Express	Courier	23.25
Various	Apple Courier Incorporated	Courier	33.00
Various	Deluxe Delivery Systems, Inc.	Courier	123.00
Various	Orbis Publications, Ltd.	Publications	678.40
04/17/91	Superintendent of Documents	Publications	5.00
Various	National News Agency	Publications	604.39
04/10/91	National Academy Press	Publications	37.05
Various	Practising Law Institute	Publications	104.94
03/08/91	Round Hill-IVC, Inc.	Equipment for Presentation	4,390.62
03/08/91	Price Waterhouse	Professional Services Fees(Accounting)	10,000.00
12/19/90	Marisia Laure	Professional Service Fees(Interpreter)	880.00
04/03/91	Bon Temps, Ltd.(Teresa Saltus)	Professional Service Fees(Clerical)	166.40
04/15/91	The Secura Group Three Lafayette Centre 1155 21st Street, N.W. Washington, D.C. 20036	Professional Service Fees(Financial)	142.50
Various	APCO Associates Three Lafayette Centre 1155 21st Street, N.W., Suite 1000 Washington, D.C. 20036	Professional Service Fees	10,667.64
04/23/91	Research Information Services	Document Retrieval	13.25
12/20/90	Disclosure	Document Retrieval	72.96
Various	Capitol District Information	Document Retrieval	363.25
Various	Lexis	Computer Research	3,169.53
Various	Westlaw	Computer Research	2,149.20
Various	A & P Attorneys	Travel Expense	24,694.08*
02/19/91	Brazilian-American Chamber of Commerce, Inc.	Meeting	65.00
		TOTAL	\$ 79,590.92

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
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Government of the Republic of Panama

Various	New York Telephone	Telephone	\$ 2.10
		TOTAL	\$ 2.10

Komatsu Ltd.

Various	Xerox Corporation	Duplicating	\$ 10,071.00
Various	C&P Telephone	Telephone	2,475.77
Various	U.S. Postal Service	Postage	36.86
Various	A&P Employees	Local Transportation	370.27
Various	A&P Employees	Cash Expenses	284.25
Various	Federal Express	Courier	100.75
01/25/91	DHL Airways	Courier	120.29
Various	Falcon Express	Courier	203.00
12/21/90	Apple Courier	Courier	18.00
Various	A&P Attorneys	Travel Expenses	1,253.62*
Various	Lexis	Computer Research	93.22
12/05/90	Soller, Singer, and Horn	Professional Service Fees	330.00
04/17/91	Superintendent of Documents	Publications	5.00
		TOTAL	\$ 15,362.03**

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

** In addition, during the six-month period, Registrant credited the foreign principal's account for disbursements aggregating \$216.75 that had previously been mistakenly charged to the account (and previously reported as disbursements on behalf of the foreign principal in prior supplemental Statements of the Registrant).

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Venezuela, Gov't of</u>			
Various	Xerox Corporation	Duplicating	\$ 75,686.79
02/25/91	Nightrider Overnite Copy Service	Duplicating	2,974.15
Various	CPC Reprographics Inc.	Duplicating	17,197.84
Various	U.S. Postal Service	Postage	25.54
Various	C&P Telephone	Telephone	8,627.70
Various	New York Telephone	Telephone	2,451.09
Various	A&P Employees	Local Transportation	35,538.88
Various	A&P Employees	Cash Expenses	10,035.72
Various	A&P Attorneys	Travel Expense	51,037.67*
Various	Deluxe Delivery Systems, Inc.	Courier	1,109.75
Various	DHL Airways	Courier	10,363.78
Various	Federal Express	Courier	6,523.29
Various	Falcon Express	Courier	838.90
Various	Apple Courier	Courier	61.00
Various	Network Courier	Courier	156.00
Various	Eastern Connection Operating	Courier	39.50
Various	Olympic Courier Systems, Inc.	Courier	29.30
Various	World Courier	Courier	9,597.50
Various	Quick International Courier	Courier	230.00
Various	TNT Skypak	Courier	1,122.19
Various	Lexis	Computer Research	2,781.02
Various	Westlaw	Computer Research	3,517.20
Various	National News Agency	Publications	604.39
Various	Disclosure Inc.	Document Retrieval	365.23
Various	Ruesch Intl. McCarthy & Tetrault	Professional Service Fees	50,521.07
Various	CT Corporation System	Professional Service Fees	15,690.50
12/31/90	Law Debenture Trust	Professional Service Fees	6,328.26
01/24/91	Joseph T. Maloney Associates	Professional Service Fees	739.75
Various	Slaughter and May (London and New York)	Professional Service Fees(Legal Services)	365,306.00
05/20/91	Stella Couré	Professional Service Fees(Translation)	648.15
		TOTAL	\$ 680,148.16

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Asociacion Colombiana de Exportadores de Flores (Asocolflores)</u>			
Various	Xerox Corporation	Duplicating	\$ 10,849.75
05/17/91	U.S. Department of Commerce	Duplicating	31.80
Various	CPC Reprographics	Duplicating	37,072.41
Various	C&P Telephone	Telephone	3,328.88
Various	U.S. Postal Service	Postage	114.00
Various	A&P Employees	Local Transportation	750.33
Various	A&P Employees	Cash Expenses	1,149.55
Various	Lexis	Computer Research	1,866.32
04/01/91	Westlaw	Computer Research	23.40
12/07/90	Various A&P Attorneys	Travel Expense	4,159.21*
Various	Federal Express	Courier	22.75
Various	DHL Airways	Courier	2,222.14
Various	Falcon Express	Courier	953.40
Various	Apple Courier Incorporated	Courier	30.75
Various	APCO Associates		
	Three Lafayette Centre		
	1155 21st Street, N.W., Suite 1000	Professional Service	
	Washington, D.C. 20036	Fees	4,136.45
Various	Devillier Communications, Inc.		
	1511 K Steet, N.W., Suite 1100	Professional Service	
	Washington, D.C. 20005	Fees(Monitoring	
		Services)	706.11
Various	ICF Consulting	Professional Service	
	1850 K Street, N.W., Suite 1000	fees(Antidumping	
	Washington, D.C. 20006	Consulting Services)	25,561.12
02/12/91	Akin, Gump, Strauss,		
	Hauer & Feld		
	1333 New Hampshire Ave., NW		
	Suite 400	Professional Service	
	Washington, D.C. 20036	Fees (Legal Fees for	
		Antidumping Appeal)	7,524.45
		TOTAL	\$ 100,502.82

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Government of Chile</u>			
Various	Xerox Corporation	Duplicating	\$ 7,945.50
Various	C&P Telephone Company	Telephone	685.45
Various	U.S. Postal Service	Postage	5.45
Various	A&P Employees	Local Transportation	748.52
Various -	A&P Employees	Cash Expenses	1,814.17
Various	Lexis	Computer Research	4,947.32
01/01/91	Westlaw	Computer Research	4,464.00
Various	Federal Express	Courier	436.16
Various	Falcon Express	Courier	394.40
Various	Apple Courier	Courier	255.50
03/27/91	World Courier	Courier	225.00
Various	Karin Ruckhaus	Professional Service	
		Fees(Translation)	4,144.00
01/25/91	Stella Coure	Professional Service	
		Fees(Translation)	2,450.00
01/25/91	Eugenio Maseda	Professional Service	
		Fees(Translation)	466.00
01/25/91	Guillermo Baserva	Professional Service	
		Fees(Translation)	1,500.00
06/03/91	ENVIRON Corporation	Professional Service	
	4350 North Fairfax Drive	Fees(Scientific	
	Arlington, VA 22203	Consulting)	8,757.85
12/26/90	Research Information Service	Document Retrieval	83.74
01/09/91	Radio TV Reports, Inc.	Depositions	47.10
		TOTAL	\$39,370.16
 <u>Intl. Comm. Clearing House, Ltd.</u>			
Various	Xerox Corporation	Duplicating	\$ 100.00
01/01/91	C&P Telephone Company	Telephone	.64
		TOTAL	\$ 100.64

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Asociacion Venezolana de Productores de Cementos</u>			
Various	Xerox Corporation	Duplicating	\$ 3,189.25
01/11/91	U.S. Department of Commerce	Duplicating	13.54
Various	Disclosure	Duplicating	77.00
04/15/91	Akin, Gump, Strauss, Hauer & Feld	Duplicating	216.02
Various	C&P Telephone	Telephone	857.27
Various	U.S. Postal Service	Postage	9.47
Various	A&P Employees	Local Transportation	336.77
Various	A&P Employees	Cash Expense	205.30
Various	A&P Attorneys	Travel Expense	1,801.63*
02/11/91	DHL Airways	Courier	67.99
Various	Falcon Express	Courier	139.55
Various	Lexis	Computer Research	1,774.98
Various	APCO Associates Three Lafayette Centre 1155 21st Street, N.W., Suite 1000 Washington, DC 20036	Professional Service Fees	87,241.26
Various	Robert E. Litan 3 Golden Crest Court Rockville, MD 20854	Professional Service Fees(Economic Analysis for Antidumping Appeal)	9,570.00
01/22/91	Superintendent of Document	Document Retrieval	21.00
05/03/91	ATLIS Federal Service	Document Retrieval	23.64
		TOTAL	\$ 105,544.67
<u>Asociacion de Productores de Salmon y Trucha de Chile (A.G.)</u>			
Various	Xerox Corporation	Duplicating	\$ 792.75
Various	C&P Telephone Company	Telephone	251.71
Various	A&P Employees	Local Transportation	112.85
Various	A&P Employees	Cash Expense	170.95
Various	Lexis	Computer Research	103.19
05/17/91	DHL Airways	Courier	69.01
05/16/91	Falcon Express	Courier	22.00
		TOTAL	\$ 1,522.46

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Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Sural Ca.</u>			
Various	Xerox Corporation	Duplicating	\$ 6,933.50
01/24/91	CPC Reprographics Inc.	Duplicating	124.94
02/25/91	U.S. Department of Commerce	Duplicating	3.92
Various	C&P Telephone	Telephone	1,132.68
Various	New York Telephone	Telephone	22.83
Various	U.S. Postal Service	Postage	26.96
Various	A&P Employees	Local Transportation	302.03
Various	A&P Employees	Cash Expenses	212.34
Various	A&P Attorneys	Travel Expense	1,173.58*
Various	Federal Express	Courier	270.85
02/11/91	DHL Airways	Courier	159.00
Various	Falcon Express	Courier	501.70
03/15/91	Deluxe Delivery Systems	Courier	15.00
Various	Lexis	Computer Research	3,504.90
Various	Westlaw	Computer Research	988.20
01/25/91	Research Information Service	Document Retrieval	507.62
03/05/91	Frank Zorino	Travel	
		Reimbursement	655.00**
12/21/90	APCO Associates		
	Three Lafayette Centre		
	1155 21st Street, N.W., Suite 1000	Professional Service	
	Washington, D.C. 20036	Fees	<u>6.00</u>
		TOTAL	\$ 16,541.05

* These travel expenses were for attorneys at the firm for travel in connection with activities referred to in Item 11, such as for meetings with clients and third parties, and not for Item 12 activities.

** Reimbursement of travel expenses for a representative of the foreign principal to come to the United States.

Attachment 15C

15(c). Disbursements-Political Contributions

During this 6-month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things or value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

☐ Yes

☒ No^{*/}

^{*/} However, the following persons who have filed Short-Form Registration Statements have made political contributions in connection with elections for federal offices:

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
NANCY ABRAMOWITZ			
01/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
WILLIAM BAER			
01/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
PAUL BERGER			
01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
12/28/90	\$1,500.00	AIPAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
03/19/91	\$ 250.00	Washington Pol. Action Comm.	Various
03/29/91	\$ 500.00	Re-Elect Packwood Committee	Robert Packwood
05/14/91	\$ 250.00	Hoyer for Congress	Steny Hoyer
05/30/91	\$ 500.00	Friends of Mel Levine	Mel Levine
05/30/91	\$ 500.00	Ferraro for U.S. Senate	Geraldine Ferraro

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<i>PETER BLEAKLEY</i>			
01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>BROOKSLEY BORN</i>			
01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>MARK BOSCOE</i>			
01/15/91	\$ 85.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 95.00	Arnold & Porter Partners PAC	Various
<i>HOWARD CAYNE</i>			
01/15/91	\$ 95.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 105.00	Arnold & Porter Partners PAC	Various
<i>GEORGE COVUCCI</i>			
01/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>MYRON CURZAN</i>			
01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>WHITNEY DEBEVOISE</i>			
01/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
02/17/91	\$ 25.00	Maryland Republican Party	Various
04/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
<i>JAMES DOBKIN</i>			
01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>A. PATRICK DOYLE</i>			
01/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>DOUGLAS DWORKIN</i>			
01/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<i>THOMAS DWYER</i> 01/10/91	\$ 420.00	Arnold & Porter Partners PAC	Various
<i>JAMES FITZPATRICK</i> 01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>MATTHEW FRUMIN</i> 05/25/91	\$ 50.00	Handgun Inc.	Various
<i>MELVIN GARROW</i> 01/15/91	\$ 225.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 225.00	Arnold & Porter Partners PAC	Various
<i>JOSEPH GUTTENTAG</i> 01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>RICHARD HUBBARD</i> 01/15/91	\$ 200.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 200.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 37.00	Dollars for Democrats (D.C.)	Various
<i>ROBERT J. JONES</i> 01/15/91	\$ 175.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 175.00	Arnold & Porter Partners PAC	Various
<i>HADRIAN KATZ</i> 01/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>ABE KRASH</i> 01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>KENNETH KRUPSKY</i> 01/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<i>MICHAEL A. LEE</i>			
01/15/91	\$ 105.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
<i>KENNETH LETZLER</i>			
01/15/91	\$ 200.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 200.00	Arnold & Porter Partners PAC	Various
<i>STEVEN LOCKMAN</i>			
01/15/91	\$ 200.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 200.00	Arnold & Porter Partners PAC	Various
<i>ROBERT MANNION</i>			
01/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>CATHERINE COLLINS MCCOY</i>			
01/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
02/05/91	\$ 150.00	Republican Party of Virginia	Various
04/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
<i>MICHAEL MIERZEWSKI</i>			
01/15/91	\$ 95.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 105.00	Arnold & Porter Partners PAC	Various
<i>THOMAS MILCH</i>			
01/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>NANCY MINTZ</i>			
01/15/91	\$ 162.50	Arnold & Porter Partners PAC	Various
04/15/91	\$ 162.50	Arnold & Porter Partners PAC	Various
<i>ROBERT MINTZ</i>			
04/15/91	\$ 75.00	Arnold & Porter Partners PAC	Various
<i>BRUCE MONTGOMERY</i>			
01/15/91	\$ 225.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<i>IRVIN NATHAN</i>			
01/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
<i>G. PHILIP NOWAK</i>			
04/15/91	\$ 266.67	Arnold & Porter Partners PAC	Various
<i>KEITH PATTIZ</i>			
01/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>JACK QUINN</i>			
01/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>CLAIRE READE</i>			
01/15/91	\$ 105.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
<i>DANIEL REZNECK</i>			
01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>WILLIAM ROGERS</i>			
01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>RICHARD SCHIFTER</i>			
01/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
<i>K. PETER SCHMIDT</i>			
01/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
<i>LAWRENCE A. SCHNEIDER</i>			
01/15/91	\$ 150.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 175.00	Arnold & Porter Partners PAC	Various

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
VICTORIA SCHONFELD			
01/15/91	\$ 100.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
THOMAS SEAWELL			
01/15/91	\$ 115.00	Arnold & Porter Partners PAC	Various
CARY SHERMAN			
01/15/91	\$ 100.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 100.00	Arnold & Porter Partners PAC	Various
MICHAEL SHOR			
04/15/91	\$ 75.00	Arnold & Porter Partners PAC	Various
JEFFREY SMITH			
01/15/91	\$ 100.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 105.00	Arnold & Porter Partners PAC	Various
MICHAEL SOHN			
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
MICHAEL STOSSER			
04/15/91	\$ 75.00	Arnold & Porter Partners PAC	Various
MARK STUMPF			
01/15/91	\$ 175.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 175.00	Arnold & Porter Partners PAC	Various
STEVEN G. TEPPER			
01/15/91	\$ 62.50	Arnold & Porter Partners PAC	Various
04/15/91	\$ 62.50	Arnold & Porter Partners PAC	Various
ROBERT THORPE			
01/15/91	\$ 125.00	Arnold & Porter Partners PAC	Various
DANIEL WALDMAN			
01/15/91	\$ 95.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 105.00	Arnold & Porter Partners PAC	Various

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<i>KATHLEEN WALLMAN</i>			
02/20/91	\$ 100.00	Abrams '91	Robert Abrams
05/14/91	\$ 250.00	Leahy for U.S. Senate	Patrick Leahy
05/21/91	\$ 100.00	Synar for Congress	Mike Synar
<i>RICHARD WERTHEIMER</i>			
01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
<i>ROBERT WINTER</i>			
01/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various
04/15/91	\$ 250.00	Arnold & Porter Partners PAC	Various